

Dockets Management Branch (HFA-305)
Food and Drug Administration
5630 Fisher Lane, Room 1061, Rockville, Maryland 20852

Date: 5-8-99

(Name & Address)

10 EASTMONT

Re: Docket # 98N-1038, "Irradiation in the Production, Processing, and Handling of Food"

To whom it may concern:

Because it may be and probably will prove to be dangerous to health,
The FDA should retain the current labeling law, the current terminology of "treated with radiation" and use the radura symbol on all irradiated whole foods. OR expand the label warning to include that this may be detrimental to the nutrients & food value of the product.

Regarding the issue of labeling, in its initial petition, the FDA concluded that irradiation was a material fact about the processing of food, and thus should be disclosed. The material fact remains; therefore labeling should remain. Consumer acceptability, storage qualities and nutrients are affected. Some irradiated foods have different texture and spoilage characteristics than untreated foods. Most fruits and vegetables have nutrient losses that are not obvious or expected by the consumer.

In addition, processing by irradiation causes chemical changes that are not evident and are potentially hazardous. All irradiated foods contain unique radiolytic products that have never been tested. Whether or not the FDA has approved irradiation as safe, it remains a new technology with no long-term human feeding studies. Consumers certainly have the right to know if this process has been used on their food.

As to the kind of label used, I believe that the label should be large enough to be readily visible to the consumer, on the front of the package. The label contains important information regarding the processing of the contents. For displayed whole foods such as produce, a prominent informational display should be used containing the term "irradiation" and the radura symbol. Because of the newness of the technology and the need to assess the public health effects of widespread use of irradiated foods, I believe that the FDA's labeling requirement should not be permitted to expire.

There must be greater priority given to informing and protecting the consumer - not pleasing those whose only motive is profit.

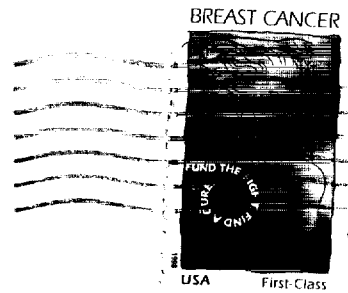
Yours Truly,

Gerald Tilley

98N-1038

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